

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

JOSEPH OZMUN,	§	
	§	
PLAINTIFF,	§	CASE NUMBER: 1:16-cv-00940-SS
	§	
v.	§	
	§	
PORTFOLIO RECOVERY	§	
ASSOCIATES LLC; RAUSCH, STURM,	§	
ISRAEL, ENERSON & HORNIK LLC;	§	
WESTERN SURETY COMPANY, and;	§	
TRAVELERS CAUSUALTY AND	§	
SURETY COMPANY OF AMERICA	§	
	§	
DEFENDANTS.	§	

**PLAINTIFF’S MOTION TO POSTPONE RULING ON THE MOTION FOR SUMMARY
JUDGMENT FOR AN ADDITIONAL 30 DAYS**

Plaintiff, Joseph Ozmun, by his attorneys, Community Lawyers Group, Ltd., the Law Office of Tyler Hickle, and Zimmer & Associates, makes this Motion to Postpone Ruling on Defendant’s Motion for Summary Judgment, and states as follows:

1. On April 12, 2017, the Court ordered that the parties consult in person with appropriate representatives, counsel, Mr. Ozmun in attendance, before a ruling on the motion for summary judgment would be made. (Dkt. #56).\
2. In its April 12, 2017 order, the Court gave the parties 30 days to consult in person. (Dkt. #56, p. 2).
3. Parties have been consulting in an attempt to resolve this matter through settlement.
4. Plaintiff has been unable to confer in person within the 30 days provided due to his work schedule.

4. Plaintiff has proposed a conference for May 23, 2017, at 10:00 AM, and would like an opportunity to confer with Defendants in person pursuant to the Court's April 12, 2017 order, and prior to the Court's decision on Defendant's Motion for Summary Judgment.

6. Accordingly, Plaintiff asks that the Court postpone its ruling on Defendants' Motion for Summary Judgment for an additional 30 days to give the parties additional time to confer.

WHEREFORE, Plaintiff respectfully requests that the Court postpone its ruling on Defendants' Motion for Summary Judgment for an additional 30 days, or for any other relief deemed necessary by the Court.

By: s/Tyler Hickle

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**CERTIFICATE OF CONFERENCE FOR PLAINTIFF'S MOTION TO POSTPONE
RULING ON DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

I hereby certify that I conferred with counsel of record for all defendants, on May 11, 2017, regarding Plaintiff's request for the relief sought in this motion. Defendants oppose the motion, stating that Plaintiff should have been able to schedule and hold the conference within the originally allocated 30 days.

By: s/Tyler Hickle
Tyler Hickle

CERTIFICATE OF SERVICE

I, Tyler Hickle, an attorney, hereby certify that on May 11, 2017, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all attorneys of record.

Respectfully submitted,

By: s/Tyler Hickle
Tyler Hickle